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7 **Attorney for Plaintiff TAMARA DOUKAS**

8 **THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
10 **DIVISION OF SAN FRANCISCO**

11 TAMARA DOUKAS, an individual,

12 Plaintiff,

13 v.

14 COUNTY OF SAN MATEO, a public entity,  
15 PENINSULA HUMANE SOCIETY, a private  
16 non-profit organization, DEBI DENARDI, an  
17 individual, KIM HADDAD, an individual,  
18 KKH INC, a private entity, SPIKE REAL  
19 STATE, a private entity, and DOES 1 through  
20 50, inclusive,

21 Defendants.

**CV 08 2336 SI**

**PLAINTIFF TAMARA DOUKAS'S  
INITIAL DISCLOSURES PER RULE 26(a)  
and 26(f)**

22 Witnesses

23 Tamara Doukas

24 Ann Doukas

25 Steven Doukas

26 All three people above were present the afternoon Kodiak was killed and witnessed the  
27 killing as well as statements beforehand and Kodiak's condition.

28 The below people have knowledge about Kodiak's health in the days, weeks and months  
preceding his killing.

1 Specialist Dr. George Doering 987 Laurel St, San Carlos, CA 94070, 650-598-0968.

2 Specialist Dr. Janet Dunn PO Box 644, San Mateo, CA 94401, 650-839-0323.

3 Scout's House (therapist name unknown) 506 Santa Cruz Avenue, Menlo Park CA 94025,  
4 650-328-1430

5 Caroline Kwan 1999 Fernside St, Redwood City, CA 94061, 510-375-7526.

6 Christopher Johnson 1999 Fernside St, Redwood City, CA 94061, 650-208-8101.

7 Specialist Dr. George Doering 987 Laurel St, San Carlos, CA 94070, 650-598-0968.

8 Specialist Dr. Janet Dunn PO Box 644, San Mateo, CA 94401, 650-839-0323

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10  
11 Dr. Victoria Sweet, MD  
12 (650) 365-2398  
13 1947 Alameda de las Pulgas  
14 Redwood City, CA 94061

15 b. James Knapp  
16 (650) 568-3402  
17 1959 Fernside Street  
18 Redwood City, CA 94061

19 c. Bea Moore  
20 (650) 368-4753  
21 1991 Fernside Street  
22 Redwood City, CA 94061

23 d. Gertrude Ruschoff  
24 (650) 366-4536  
25 1951 Fernside Street  
26 Redwood City, CA 94061

27 e. Donald Montalvo  
28 (650) 375-0600  
1967 Fernside Street  
Redwood City, CA 94061

f. Brent Roles  
(650) 365-5903  
165 Woodside Drive  
Woodside, CA 94061

1 g. Michelle Schneider and Lin Wang  
2 (650) 363-8517  
3 1930 Alameda de las Pulgas  
Redwood City, CA 94061

4 h. Eric and Pamela Schneider  
5 (650) 464-4730  
6 1975 Fernside Street  
Redwood City, CA 94061

7 i. Kumutnad Brannan  
8 1650 Alameda de las Pulgas  
9 Redwood City, CA 94061  
(650) 367-0374

10 Store employees that saw Kodiak inside or just outside the store on days immediately prior to  
his death:

11 a. Kristina Ruble  
12 (510) 318-0255  
13 Pet Food Express  
14 372 Woodside Plaza  
Redwood City, CA 94061

15 b. Paolo Ceccato  
16 (650) 591-3355  
17 California Carpet  
695 Industrial Road  
San Carlos, CA 94070

18  
19 Employees of Peninsula Humane Society are aware of its practices and Denardi's failure to  
20 utilize proper procedures. Employees of the San Mateo District Attorney, including Mr.  
21 Wagstaffe have knowledge of the incident.

22 Document Production: Plaintiff has already produced documents required by  
23 FRCP26(a)(1)(A)(ii).  
24

25 Damages Computation:

26 Medical Bills --- These are expected to increase. Plaintiff believes that defendants have  
27 the current bills and records per their subpoena of same.

28 Plaintiff has sought medical counseling the records of which have been produced to

1 Defendants. Any billing records should be in those records and have already been disclosed.

2 Loss of Income—Plaintiff currently makes \$3250.00 net per month. Her estimate for her  
3 earning capacity with a PhD is \$10,000. This is based on the difference between Plaintiff's likely  
4 salary her first year after obtaining her PhD and her actual income. In addition, in the future the  
5 income differential will remain and every year she is likely to make less than she would have had  
6 she obtained her PhD as scheduled until the last year of her employment.  
7

8 Emotional Distress - \$250,000 or more based on Plaintiff's extreme attachment to Kodiak  
9 and being forced to watch him forcibly killed.  
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11 Dated: August 8, 2008

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s/s

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13 Daniel Berko, Attorney for Plaintiff,  
Tamara Doukas  
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